

AO 91 (Rev. 11/11) Criminal Complaint (modified by USAO for telephone or other reliable electronic means)

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

RONELL STACY RHODES

Case No. 3:21MJ159

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 18, 2021 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 922(g)(1) & 924(a)(2) Felon in Possession of a Firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Dustin Phillips

Complainant's signature

TFO Dustin J. Phillips, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
FaceTime (specify reliable electronic means)

Date: 4/30/21

City and state: Dayton, Ohio

Sharon L. Ovington

Sharon L. Ovington
United States Magistrate Judge



AFFIDAVIT

I, Dustin J. Phillips, a Task Force Officer ("TFO") for both the Federal Bureau of Investigation ("FBI") and City of Dayton Police Department ("DPD"), being duly sworn, depose as follows:

INTRODUCTION

1. I have been employed as a law enforcement officer for the past thirteen (13) years. I currently serve as a detective with the DPD. I am presently a TFO with the FBI Dayton Resident Office's Safe Streets Task Force (SSTF). As such, I have been sworn under Title 21, United States Code ("U.S.C."), Section 878, to serve as an officer of the United States duly empowered to conduct federal criminal investigations and execute arrests for criminal violations of Titles 18 and 21 of the U.S.C.
2. I am also a TFO with the DPD's Major Case/Drug Enforcement Unit within the Narcotics Bureau. Since 2013, in my roles with SSTF and DPD, I have almost exclusively concentrated on the investigation of: narcotics-, firearms-, and gang-related criminal cases. During my law enforcement career, I have been involved in a large number of firearm-related arrests, executions of search warrants resulting in the seizure of large quantities of narcotics and firearms, participated in undercover narcotics purchases, and supervised the activities of police informants who have provided law enforcement authorities valuable and accurate information and assistance that ultimately resulted in undercover narcotics purchases and apprehensions. During the course of my law enforcement career, I have received an extensive amount of formal and informal training in the investigation of drug trafficking and narcotics-related crimes.
3. This affidavit is submitted in support of a criminal complaint, which seeks the issuance of a federal arrest warrant against **RONELL STACY RHODES** (hereinafter referred to "**RHODES**") for Being a Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).
4. The facts contained in this affidavit are submitted for the express purpose of establishing probable cause to obtain an arrest warrant for **RHODES**. This affidavit does not include every fact known to law enforcement authorities relevant to subject investigation.
5. The facts in this affidavit come from my review of records and evidence, my training and experience, and information I have received from other law enforcement officers. I have not distinguished between information of which I have direct and indirect knowledge.

FACTS

6. On or about March 18, 2021, at approximately 1535 hours, members of the DPD Narcotics Bureau executed a state search warrant at a residence located at 1816 Germantown Street in Dayton, Ohio. The supporting affidavit for this search warrant was authored by DPD Detective Lucas Rose. The search warrant was approved on March 18, 2021 by Dayton Municipal Court

Judge Christopher D. Roberts. The supporting affidavit for said search warrant specifically identified **RHODES** as the primary suspect in the investigation.

7. On or about that same day, prior to the search warrant being served, law enforcement conducted surveillance on the residence, which is an apartment in a large housing complex. While conducting surveillance, law enforcement observed a person who appeared to be **RHODES** arrive in a vehicle and walk into the back door of the target location. **RHODES** used a key to gain access to the apartment. As **RHODES** entered the apartment, he was wearing a black sweat suit and a small blue backpack. Law enforcement continued surveillance on the apartment after **RHODES** went inside. Once **RHODES** was inside, law enforcement began seeing individuals approach the apartment on foot and in vehicles. These individuals would briefly enter 1816 Germantown Street through the rear door, and after a short time, they would quickly exit and leave the immediate area. Based on my training and experience, I believe that this activity is consistent with narcotics being trafficked from this location.
8. At approximately 1510 hours, **RHODES** was seen exiting the back door of the residence and returning to the vehicle he arrived in. **RHODES** was still wearing the same clothing, but he was no longer wearing the blue backpack. **RHODES** quickly returned to the apartment, again using a key to gain entry, and went inside. He was inside a short period of time and then again returned to the vehicle and left the area. Certain DPD personnel were able to follow him away from the area and ultimately saw him park the car at 21 Carma Drive in Trotwood, Ohio. As this occurred, other law enforcement personnel also remained at 1816 Germantown Street to ensure no other people went into the apartment. As **RHODES** parked, DPD personnel made contact with him, and he was secured in handcuffs. Once secured, **RHODES** was found to be in possession of \$8,800 in his right front pocket, along with a set of three keys and \$1.081 in his left front pocket.
9. DPD personnel subsequently searched the residence at 1816 Germantown Street, using one of the keys that **RHODES** had in his pocket to gain entry. Inside, law enforcement did not locate any other people. While searching the residence, a detective found a blue backpack, which fell out of a closet when the door was opened. This backpack was ultimately found to contain a digital scale, sandwich baggies, a bottle of Mannitol (which is a common narcotics cutting agent), an extended magazine to a Glock .45 caliber pistol (which was loaded with one live round), and an eyeglasses case containing several baggies of suspected narcotics. Directly outside the closet, law enforcement found a red shopping bag sitting between the television and the closet. Sitting on top of all the other contents of the bag, law enforcement located a Glock .45 caliber pistol with serial number XLG860, which was loaded with twelve (12) live rounds in the magazine and one (1) round in the chamber. The magazine located inside the blue backpack matched and fit the firearm located in the red bag just outside the closet.
10. During the search, law enforcement also located certain items of possessory interest, including, but not limited to: Greater Dayton Premier Management (GDPM) mail sent to **RHODES** at 1816 Germantown Street and a GDPM rent statement issued to **RHODES** for this residence, titles to two vehicles registered to **RHODES**, and several additional pieces of mail sent to **RHODES** listing his address as 1816 Germantown Street. Detectives also located and

collected a magic bullet blender, which had a small amount of a white powder residue inside. Magic Bullet blenders are commonly used to process illegal narcotics and to prepare them for sale. Lastly, an additional \$377 in US currency was located inside a lamp base on an end table in the living room.

11. I have consulted with Special Agent ("SA") Christopher Reed of the Bureau of Alcohol, Tobacco, Firearms, and Explosives. SA Reed specializes in the identification of firearms and their origin/place of manufacture. SA Reed has advised me that Glock firearms are not manufactured in the State of Ohio. As such, the Glock firearm recovered from the subject residence had previously moved in interstate commerce.
12. I have conducted a criminal records check of **RHODES**. I have learned that **RHODES** was on federal supervised release at the time of his arrest on or about March 18, 2021. Additionally, it has been determined that **RHODES** had previously been convicted of several prior felony, which is punishable by a term of imprisonment exceeding one year. Specifically, he was convicted in the United States District Court for the Southern District of Ohio, in Case Number 3:09-CR-015, of the following:
 - a. Possession with Intent to Distribute Five (5) grams or More of Cocaine Base, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B) (Count 1);
 - b. Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c)(1)(A) (Count 2); and
 - c. Possession of a Firearm by Convicted Felon, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2) (Count 3).

RHODES was sentenced to an aggregate term of imprisonment of 120 months for these three offenses, including a 60-month term for his conviction on Count 2.

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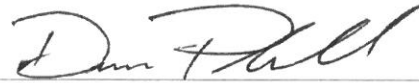
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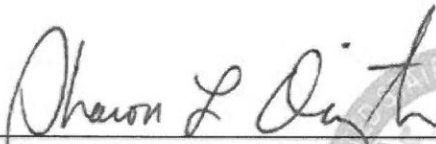
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13. Based on the above information, I believe that probable cause presently exists to conclude that, on or about March 18, 2021, while in the Southern District of Ohio, **RHODES** knowingly possessed, in and affecting interstate commerce, a loaded Glock .45 caliber pistol with serial number XLG860, together with associated ammunition, after being previously convicted of certain felony crimes each punishable by a term of imprisonment exceeding one year, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).



Dustin J. Phillips, Task Force Officer
FBI-SSTF Task Force
DPD-CIRGV Task Force

Subscribed and sworn to before me this 30th day of April 2021.



Sharon L. Ovington
United States Magistrate Judge

